

ORIGINAL

CITY OF HOMESTEAD

ATTORNEY/CLIENT SESSION

IN RE: JAMES ERIC McDONOUGH V. CITY OF HOMESTEAD, et al

CITY HALL

100 CIVIC COURT

HOMESTEAD, FLORIDA 33030

THURSDAY, MARCH 2, 2017

5:41 p.m. - 5:55 p.m.

Taken before Mary G. Stephenson, Notary Public

for the State of Florida.

1 APPEARANCES:

2 COUNCIL MEMBERS:

3 JEFF PORTER, MAYOR

PATRICIA FAIRCLOUGH, VICE MAYOR

4 JON BURGESS

ELVIS R. MALDONADO

5 LARRY ROTH

STEPHEN R. SHELLEY

6 JIMMIE L. WILLIAMS, III

7
8
9
10
11
12 CITY ATTORNEY:

13 WEISS SEROTA HELFMAN

COLE & BIERMAN, P.L.

14 BY: RICHARD JAY WEISS, ESQ.

ERIC STETTIN, ESQ.

15 MATT PEARL, ESQ.

MATT MANDEL, ESQ.

1 Thereupon, the following proceedings were had:

2 MAYOR PORTER: I'm calling this public
3 meeting to order.

4 The time is now 5:41.

5 We are about to have an attorney/client
6 session in accordance to Florida Statute 286.011
7 regarding the litigation styled James Eric
8 McDonough versus City of Homestead, Case Number
9 1:16-cv-24524, pending in the United States
10 District Court, Southern District of Florida.

11 The session is estimated to last one hour.
12 The following people will be in attendance:
13 Myself, Vice Mayor Fairclough, Mr. Williams,
14 Mr. Shelley, Mr. Burgess, Mr. Maldonado, Mr. Roth,
15 City Attorneys Eric Stettin, Matt Pearl, Matt
16 Mandel and Richard Weiss.

17 These proceedings will be recorded by a
18 certified court reporter and, at the conclusion of
19 all litigation discussed, the transcript will be
20 made part of the public record.

21 All those I have not mentioned should leave
22 the room at this time.

23 Matt.

24 MR. MANDEL: Good evening and good to see a
25 lot of you.

1 For those that I haven't met, I am Matt
2 Mandel. I'm head of the litigation group in the
3 Weiss Serota firm, and it's my pleasure to be
4 before the council again. So, hello.

5 We are here to talk about this brand new
6 lawsuit, 92 page lawsuit that was brought by
7 Mr. McDonough that alleges a whole slew of claims
8 against the city, a couple of things against the
9 mayor, a couple of things against the city
10 manager, a lot of claims against the chief of
11 police, 17 claims against Mr. Aquino, from IA, and
12 the lion share of the claims are against Police
13 Officer Murguido.

14 Basically, we are still going through this
15 extremely voluminous complaint in terms of the
16 facts and tortured history of this matter, but it
17 essentially initially stems from a disagreement
18 between Mr. McDonough and Mr. Murguido as kind of
19 just spiraling out of control and has kind of
20 taken a life on its own. He's now not just suing
21 the city and 12 police officers of the city, he is
22 suing Miami-Dade County, ten different employees
23 of Miami-Dade County. He is suing Monroe County
24 and various employees of Monroe County. He is
25 also suing an urgent care center in southern

1 Florida as well.

2 COUNCILMAN BURGESS: Urgent care, how does
3 that tie in?

4 MR. MANDEL: That is where he was Baker
5 Acted.

6 There is something called -- for those --
7 Councilman Shelley, as you know, there is what is
8 called shotgun pleading. This is a shotgun
9 pleading where you just plead everything and throw
10 as much as you can against the wall and see what
11 sticks and that is what they are doing here.

12 We have a job now to go through it and
13 dispose of it, at least, as it relates to the city
14 and the various different city employees.

15 Now, I think the most important thing that
16 we need to get to tonight, the issues are this.
17 We have individuals, individual employees are sued
18 and also the city.

19 MR. WEISS: And the mayor.

20 MR. MANDEL: And the mayor and the city
21 manager.

22 COUNCILMAN BURGESS: He has enough. He can
23 defend himself.

24 COUNCILMAN WILLIAMS: I have nothing.

25 MR. MANDEL: What we need to do and what we

1 would recommend is that our law firm represent, of
2 course, not only the city, but the mayor and the
3 city manager and all city employees.

4 At this point, we have looked at based on
5 our knowledge of the facts of the case, based on
6 our knowledge of the history, we don't see any
7 conflict, any situation at this point where the
8 city and any of the folks on behalf of the city
9 have any type of conflicts.

10 So what we need to do is get the council's
11 blessing. We don't need to get a vote. Just get
12 a consensus on that, for our law firm to represent
13 the city and the other individuals affiliated with
14 the city.

15 COUNCILMAN WILLIAMS: You want us to give
16 you permission to represent the mayor and all
17 those people, the chief, workers?

18 MR. STETTIN: Just the city employees.

19 COUNCILMAN WILLIAMS: Well, we are city
20 employees. I think the mayor should be
21 represented.

22 MR. MANDEL: Correct.

23 COUNCILMAN BURGESS: Can the mayor leave so
24 I can say whatever I want?

25 MR. WEISS: Some cities do go out and hire

1 special counsel for all of these people, but we
2 think it's an awfully expensive --

3 COUNCILMAN WILLIAMS: Mayor, do you feel
4 comfortable with it?

5 MAYOR PORTER: Yes, sir. I think we have
6 done nothing wrong.

7 MR. MANDEL: I will tell you, the counts
8 against the mayor flow from the two times that
9 Mr. McDonough tried to speak at a council meeting
10 January of 2015 and February 2015, and also the
11 claims against Mr. Gretsas as well. So the mayor
12 and the city of manager have the least amount of
13 fire directed at them.

14 We think the complaint as pled is very
15 flawed. We have a lot of defenses we think, a lot
16 of bases to move to dismiss here.

17 Once we get the green light from the city
18 in terms of representing the city and the city
19 employees, the very first thing we will be doing
20 is piecing together a motion, a comprehensive
21 motion to dismiss. This is with Judge Kathy
22 Williams, who is a federal district court judge,
23 used to be the federal public defender in the
24 Southern District of Florida.

25 Ironically, I had a case with her maybe

1 about two years ago where we had a shotgun
2 pleading. She threw it out because it was a
3 shotgun pleading, and it was a lot less egregious
4 than what we have here. There is some precedent
5 with her. We will make a lot of the same
6 arguments.

7 At this point, the most important thing is
8 that we get authorization from the council.

9 Now, what does that entail? Letters. We
10 have to issue letters to the city employees for
11 them to basically waive any potential type of
12 conflict. This will go out to all the employees
13 for them to sign, and, similarly, the city will
14 have to sign a letter allowing us to represent the
15 employees. We need to do that pursuant to the
16 Rules of Professional Conduct.

17 COUNCILMAN WILLIAMS: Question.

18 MR. MANDEL: Yes, councilman.

19 COUNCILMAN WILLIAMS: Let's say those
20 people listed, they take a more aggressive action
21 to sue them themselves?

22 MR. STETTIN: You mean countersue.

23 COUNCILMAN WILLIAMS: Countersue. We have
24 nothing to do with that.

25 MR. MANDEL: Right. If they want to file a

1 counterclaim, it would be our recommendation that
2 they would have to hire somebody to bring a
3 counterclaim on their behalf. This is just to
4 defend them.

5 COUNCILMAN WILLIAMS: I think that needs to
6 be made clear.

7 MR. WEISS: We would never -- in any case
8 where we file the counterclaim, I think there have
9 been some cases, we view that as a new lawsuit and
10 we would come to the council and we would never
11 file a counterclaim like that without council
12 authorization.

13 MAYOR PORTER: Just for the record, he is
14 suing personally and professionally in our
15 capacity because we work for the city. So it's
16 more than just me being mayor. He is suing me
17 personally.

18 MR. MANDEL: That is correct.

19 MR. WEISS: And I know this goes without
20 saying, but we do, aside from our regular just
21 responsibilities, we have personal relationships
22 with a lot of people that have been sued; the
23 mayor, George, members of the police department.
24 We do take them very, very seriously. I know the
25 mayor knows how seriously we take them. We have

1 been through a lot together. George, I know, we
2 have spoken with him, and, you know, we will get
3 those people out, do everything we can to get
4 those people out and eliminate them, eliminate the
5 whole lawsuit, but we do take it very seriously
6 that we are representing individuals who have
7 stuff at stake.

8 MAYOR PORTER: And we are all vulnerable.
9 All of us individuals are all vulnerable in this
10 position.

11 Yes, sir.

12 COUNCILMAN SHELLEY: Quick question. The
13 manager and the mayor, no problem there.

14 On the other employees, not knowing all the
15 facts or details, all of the allegations arise or
16 relate to their employment with the city, arising
17 out of their acts?

18 MR. STETTIN: According to our
19 investigation, yes.

20 The plaintiff, Mr. McDonough or
21 Dr. McDonough is trying to create things that may
22 be more difficult and he alleges certain things
23 were outside the course and scope or in bad faith.
24 We disagree with that. Just because he alleges
25 that, doesn't mean we have to go along with it.

1 We think everything the mayor, the manager and the
2 officers did at this point appears to be in good
3 faith and done, whatever they did was in the
4 city's interest.

5 COUNCILMAN SHELLEY: As the lawsuit
6 develops, as discovery proceeds if anything looks
7 like there is some factual basis to anything done
8 outside the scope of their employment, at that
9 time, do you guys come back to us and then we have
10 another decision to be made?

11 MR. MANDEL: Right. Councilman Shelley,
12 part of our letters will say something along those
13 lines, that at this point, we don't think there is
14 a conflict, but if one arises that basically the
15 employee with allow us to continue representing
16 the city, allow us to withdraw from representing
17 them without raising any conflict issue or seeking
18 to disqualify us from representing the city or the
19 other defendants. That is another purpose of the
20 letter.

21 MR. WEISS: We have had this issue come up
22 in other circumstance. I think it may have come
23 up in one of the Deegan cases.

24 George is not here, but I'll tell you the
25 way he feels about it, which is our employees, the

1 manager, the mayor never would have had any
2 contact with Mr. McDonough had it not been for
3 their job. George takes a very sort of broad view
4 of the fact they never would have touched this
5 guy. So really anything that has to do with --

6 COUNCILMAN SHELLEY: I know what some of
7 his allegations have been. So mine is more about
8 the original initiator of the emotional roller
9 coaster that he is now alleging this. That
10 initial incident may or may not be within the
11 scope of the employment of the employee. That is
12 more or less why I am there and the others apply
13 to it as well.

14 I just want to make sure that the
15 authorization -- you know, everyone is presumed to
16 be acting under the employ or the guise of the
17 city.

18 MR. WEISS: If we find something --

19 COUNCILMAN SHELLEY: That is fine.

20 MR. WEISS: -- that is outside, then we
21 always bring it back.

22 COUNCILMAN SHELLEY: I just want to make
23 sure that we start off protecting everybody, but
24 if during the discovery process there looks like
25 there is something that is questionable, I want to

1 make sure I have the ability to digest that before
2 additional dollars are spent.

3 MR. STETTIN: What happened originally was
4 there was a prior McDonough Murguido lawsuit,
5 which is actually still pending right now. We
6 actually turned that file over to Travelers, which
7 was the carrier for that claim in 2011 or 2012.
8 Travelers gave us coverage and said they believe
9 he was within the course and scope and there is
10 coverage under that policy to protect Officer
11 Murguido. The allegations in this case are pretty
12 much identical.

13 COUNCILMAN SHELLEY: I am not familiar with
14 all the specific facts. I just know from bits and
15 pieces. So you guys will sort it all out.

16 MR. WEISS: If you want more details, we
17 will be happy to give you the details of it.

18 MAYOR PORTER: Let me ask a question as far
19 as going forward. We know this guy is going to
20 continue to come and hammer all of us collectively
21 and individually as we go forward.

22 We are in a case. We are in a lawsuit.
23 Anything that we say -- how can we deal with this
24 going forward? Is there anything we can do to
25 eliminate him or should we just be able to say we

1 are -- normally, you say you are in a lawsuit,
2 don't say anything.

3 COUNCILMAN WILLIAMS: Can I add something
4 on that? Se has requested a meeting with me.

5 MR. WEISS: I would not meet with him.

6 COUNCILMAN WILLIAMS: See that.

7 MAYOR PORTER: Those are the kind of things
8 that I am saying.

9 COUNCILMAN WILLIAMS: That is what I am
10 saying. How would we know?

11 MR. WEISS: I just wouldn't have any
12 contact with him. I would tell him that -- I
13 certainly would not have any contact with him or
14 his lawyer. He has the right to come and speak
15 before the council, but I don't think you should
16 comment about anything.

17 MAYOR PORTER: That is the point. We
18 haven't been.

19 MR. WEISS: I believe you have been very
20 good on that.

21 MAYOR PORTER: Yes, we have all been, you
22 know.

23 VICE MAYOR FAIRCLOUGH: It has been easy on
24 me because it has been public comment, but if he
25 speaks on an agenda item.

1 MAYOR PORTER: We are going to address
2 that. We are going to correct that. I am going
3 to correct that. Okay? We will fix that. Next
4 meeting will be done, but, yes, we are going to
5 get control, but I think from a perspective of us
6 going forward, we are all subject to this lawsuit
7 that is against George and myself personally right
8 now.

9 MR. WEISS: It's also against the city.

10 COUNCILMAN WILLIAMS: It's all of us.

11 MAYOR PORTER: Realistically.

12 I just wanted to get out. There has to be
13 some way that we shouldn't have any interaction
14 with this guy because anything we say, anything
15 gets said at the meeting will be used against us.

16 MR. MANDEL: Yes.

17 MR. STETTIN: He will bait you. He will
18 bait you.

19 MAYOR PORTER: We have about three of them.
20 We are going to get that under control.

21 MR. MANDEL: So we have consensus that we
22 can represent the city employees.

23 MR. WEISS: Good job.

24 MR. STETTIN: This is an important case.
25 We are getting the best of our best litigators.

1 Mr. Mandel is on the case. He is an excellent
2 lawyer. He is working with us. We are on top of
3 this case. This is very important for all of us.

4 MAYOR PORTER: I'll now reopen the public
5 meeting.

6 The attorney/client session has now been
7 terminated and members of the general public are
8 now invited to return for any further proceedings
9 or matters.

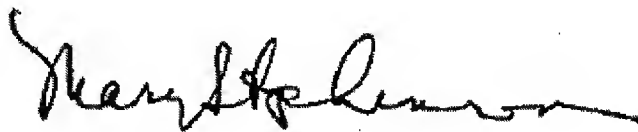
10 (Thereupon, the proceedings were concluded
11 at 5:55 p.m.)
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C E R T I F I C A T E

- - -

I, Mary G. Stephenson, FPR, State of Florida at Large, certify that I was authorized to and did stenographically report the foregoing proceedings and that the transcript is a true and complete record of my stenographic notes.

Dated this 16th day of March, 2017.



Mary G. Stephenson, FPR

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